

Part 3 - EVALUATION OF THE IMPORTANCE OF IMPACTS

CCCF proposed permit modifications for Alkaline Treatment System

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Responsibility of Lead Agency

Part 3 must be prepared if one or more impact(s) is considered to be potentially large, even if the impact(s) may be mitigated. Discuss the following for each impact identified in Column 2 of Part 2:

1. Briefly describe the impact.
2. Describe (if applicable) how the impact could be mitigated or reduced to a small to moderate impact by project change(s).
3. Based on the information available, decide if it is reasonable to conclude that this impact is **important**. To answer the question of importance, consider:
 - The probability of the impact occurring
 - The duration of the impact
 - Its irreversibility, including permanently lost resources of value
 - Whether the impact can or will be controlled
 - The regional consequence of the impact
 - Its potential divergence from local needs and goals
 - Whether known objections to the project relate to this impact.

There is judged to be no impact on the following resources for the reasons below:

Impacts on Land

The proposed action will not result in a physical change to the project site; therefore, there will be no impacts on land. All activities are to occur within existing facilities.

Impacts on Water

The addition of an Alkaline Treatment system at the CCCF will not have any impacts on any water bodies, protected or otherwise. Processing is to occur within an existing structure. Process areas drain to a public sewer for treatment at the city plant. Operations do not involve discharges to any body of water. There will be no alternation to drainage patterns or the creation of any additional impervious surfaces that could increase stormwater runoff.

Impact on Plants and Animals

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There are no threatened or endangered or non-protected species of plants or animals on the site.

Impact on Agricultural Land Resources

The project site is not agricultural land. The Alkaline Treatment process creates a product that has agronomic value as a soil amendment, which is used by the agricultural community to create optimal growing conditions. The indirect effect of the proposed project is positive.

Impact on Aesthetic Resources

The CCCF is an existing facility that is visible from Interstate 87. The proposed action will not change the appearance of the site or site improvements.

Impact on Historic and Archaeological Resources

There are no known historic or archeological sites. There will be no site construction, therefore, any unknown below grade resources will not be disturbed.

Impact on Open Space and Recreation

The project site is not an open space or recreational resource. Access to the Saranac River, which adjoins the site on the south, will not be restricted or impeded by the action.

Impact on Critical Environmental Areas

The project is not located within a designated Critical Environmental Area.

Impact on Energy

An Alkaline Treatment operation at the CCCF will use a small quantity of power at a facility where more than ample existing power capacity exists. The proposed action will not have an impact on energy.

The following impacts are judged to be small to moderate. The basis for the judgment is as follows:

Impacts on Air

The proposed project involves modification to an existing Air State Facilities permit to incorporate Alkaline Treatment in addition to the in-vessel and static pile composting already permitted on the site. All activities associated with Alkaline Treatment process are proposed to occur within an existing

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structure, eliminating the potential for fugitive emissions. The existing structure is equipped with an existing fan and stack, which will be used to capture and disperse emissions. The application for modification of the Air State Facilities permit includes a detailed analysis of potential emissions. The Air State Facilities permit will regulate emissions from the site so the potential impact from the proposed action will be small.

Impact on Transportation

The proposed project will alter the present pattern of movement of sludge from the City of Plattsburgh wastewater treatment plant (WWTP), but is the same as it was from 1986 through 2005 when the plant was operating. Currently, the sludge is thickened at the WWTP, and hauled off-site periodically for disposal at permitted landfill facilities in various locations within the region. If the City receives the modifications to the permits for the CCCF and elects to implement Alkaline Treatment of the sludge, trucks will haul the sludge from the WWTP to the CCCF facility for treatment, and consumers of the product will be transporting it from the CCCF. The estimated maximum number of vehicle trips per hour is ten. Given that past operations at the CCCF generated a far greater number of trips and that a truck route has been designated, the impact on transportation is considered small.

Public Controversy

The resumption of sludge processing has caused public controversy, primarily about odor. The City has attempted to address the concerns:

- It has provided information and an opportunity to be heard through the guidelines for Environmental Justice Areas.
- It has considered the Town's objections as an involved agency in this SEQR review process.
- The controversy cannot be mitigated except by proof that odor fears are unfounded.
- Although all the scientific evidence indicates fears are unfounded, only successful operation will reduce or eliminate the controversy.

Impact on Growth and Character of Community or Neighborhood

The Town of Plattsburgh's primary objection to the resumption of sludge processing is that the process will produce offensive odors off site that could deter future development of nearby areas in the Town such as the former Plattsburgh Air Force Base property and the former Clinton County Airport property. The City finds there is no substantial evidence to support the claim that Alkaline Treatment of sludge will have a large, adverse impact on the growth and character of the Town of Plattsburgh. This finding is based on the following:

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1. The fundamental changes in the scale and type of sludge treatment process makes it very unlikely the process will produce objectionable off site odors.
2. The facility property is zoned industrial. The most recent draft of the Town's Comprehensive Plan (4/2010) does not propose to rezone the property, or make any mention of it.
3. During the time the compost plant was in operation (1984-2005) it periodically produced offsite odors, nevertheless considerable development occurred in nearby areas of the Town such as route 3 and the former PAFB property. To the best of the City's knowledge at no time has anyone contemplating development in the Town or City contacted the City to inquire or complain about the compost facility.
4. The Alkaline Treatment process does not require a large capital investment and can be suspended or abandoned if offsite odors are unmanageable.
5. Past odor complaints came mostly from west end City residents. The City responded by voluntarily suspending operations. The "political brake" on sludge processing is constituent complaints.

Noise and Odor

The action will not generate noise that is audible off site. Processing biosolids has the potential to generate odors. Past composting operations caused objectionable off site odors, however, the Alkaline Treatment process differs and is not likely produce objectionable off site odor, because:

1. All sludge processing and product storage will be performed in an enclosed building.
2. Building air will be diluted by a 440,000 cfm fan, and discharged through a 177 foot high stack where greater air movement will provide additional dilution and dispersion.
3. The relatively small volume of sludge (less than 15% compared to past operations and less than 30% of the present composting permit) is significantly less mass that could cause odor.
4. The nature of the alkaline treatment process is such that there is significantly less odorous air to contain and control compared to composting.
5. The City will control operations and can suspend treatment if odor becomes a problem.

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6. Sludge will come only from the City and other Clinton County WPCPs, thus ensuring fresh sludge with lower odor potential and making possible the use of odor control chemicals at pre sludge treatment stages.
7. Engineering studies with odor models conclude there should be no off site odor impacts.

Evaluation of the Importance of the Odor Impact

Although the potential for odor impact is judged to be small to moderate and, therefore, the importance of the impact is not required to be evaluated, the Common Council believes it is important to discuss these factors.

The probability of the impact occurring

This factor was addressed in the preceding comments.

The duration of the impact.

If odors are detected off site, the probable cause would be equipment or process failure. A 24 hour Odor Hotline will be established to alert the City to Odor complaints. Sewage sludge deliveries can be stopped immediately. The processing time for a load of sludge is 72 hours.

Its irreversibility, including permanently lost resources of value.

The duration of odor impacts will be brief. Odor dissipates so there is no irreversible damage or permanently lost resources. If offsite odors are uncontrollable, the process can be abandoned .

Whether the impact can or will be controlled

This factor was addressed in the preceding comments.

The regional consequence of the impact.

We do not believe the alkaline treatment process will produce detectable offsite odors, but if it does, treatment can be suspended or terminated. Previously, the City has voluntarily terminated sludge processing when off site odor incidents occurred with some frequency. The majority of complaints were from City residents. City elected officials were responsive to resident complaints and there is no reason to believe that future City administrations would be less responsive.

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Its potential divergence from local needs and goals

Wastewater treatment is critical to thriving communities. Without adequate treatment capacity, development cannot occur. The City processes most of the municipal sewage in Clinton County, including sewage from the Town's commercial and industrial districts and some residential areas. The resulting untreated sludge is presently disposed in landfills in Malone and Vermont. Landfilling is not reliable, sustainable, and is certainly not "green". It is also more expensive than alkaline treatment. The transportation of the sludge is a significant cost which increases with rising fuel prices. Trucks transporting sludge add to carbon emissions. Landfills are costly to construct and have limited capacity. Landfill owners and operators can regulate what is deposited in landfills and the cost of dumping. When nearby landfills reach capacity sludge must be trucked longer distances at greater cost. The cost must be passed on to City sewer users through higher sewer rates. One of NYSDEC's goals is to reduce the amount of waste going to landfills by recycling/reusing organics such as sewage sludge using processes like alkaline treatment. This project is consistent with that goal. This project also meets other goals such as conserving landfill space for materials that cannot be treated and recycled; to reduce unnecessary truck traffic and carbon emissions; and to control sewage treatment costs for system users. Alkaline treatment of sludge is consistent with these local needs and goals.

Whether known objections to the project relate to this impact.

The Town of Plattsburgh and some nearby residents strongly object to resuming the use of the compost plant facility for sludge treatment, regardless of the process. The Town has passed a "moratorium" on waste processing while it studies how to permanently prohibit such uses within the Town. However, there are also those who see the need for the project.